

1 Ismail Amin, Esq. (NV Bar No. 9343)
2 Lawrence Kulp, Esq. (NV Bar No. 7411)
3 Breane Stryker, Esq. (NV Bar No. 13594)
4 **THE AMİN LAW GROUP, NV., LTD.**
3753 Howard Hughes Parkway, Suite 200
Las Vegas, Nevada 89169
Telephone: (702) 990-3583
Facsimile: (702) 441-2488

Attorneys for Plaintiff, ABBEY DENTAL CENTER, INC.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Plaintiff, ABBEY DENTAL CENTER, INC., and Defendant, CONSUMER OPINION LLC, by and through their respective, undersigned counsel, do hereby stipulate and agree as follows:

1. The aforesaid parties are currently actively engaged in settlement negotiations in regards to the instant matter.

2. On January 6, 2016, the parties stipulated to stay the proceedings in this matter for thirty (30) days, in order to allow the parties to facilitate settlement.

3. The Court entered the parties' stipulation as an Order on January 14, 2016. [ECF No. 7]

1 4. The Court's Order was due to expire on February 5, 2016.

2 5. Due to continuing settlement discussion, the parties stipulated to stay the matter
3 for a second time on February 3, 2016.

4 6. The Court entered the parties' second stipulation as an Order on February 9,
5 2016. [ECF No. 9]

6 7. Due to continuing settlement discussion, the parties stipulated to stay the matter
7 for a third time on March 3, 2016.

8 8. The Court entered the parties' third stipulation as an Order on April 7, 2016.
9 [ECF No. 12]

10 9. Due to continuing settlement discussion, the parties stipulated to stay the matter
11 for a fourth time on April 7, 2016.

12 10. The Court entered the parties' fourth stipulation as an Order on April 20, 2016.
13 [ECF No. 14]

14 11. Due to continuing settlement discussion, the parties stipulated to stay the matter
15 for a fifth time on May 10, 2016.

16 12. The Court entered the parties' fifth stipulation as an Order on May 16, 2016.
17 [ECF No. 16]

18 13. Due to continuing settlement discussion, the parties stipulated to stay the matter
19 for a sixth time on June 9, 2016.

20 14. The Court entered the parties' sixth stipulation as an Order on June 16, 2016.
21 [ECF No. 18]

22 15. The parties continue to engage in productive settlement discussion. As part of
23 their ongoing discussion, the parties have been negotiating language to be included in the
parties' settlement agreement. Coming to an agreement on the appropriate language for
inclusion has caused delays in the parties' negotiation efforts, as the conclusion will impact
future litigation. Accordingly, in order to facilitate those efforts, as well as to minimize

1 attorneys' fees and other legal expenses, the parties believe that the present civil action should
2 be stayed for an additional sixty (60) days.

3 16. Therefore, the parties agree that the Court may enter the following Order and
4 request that the Court do so accordingly:

5 a. Except as otherwise provided below, this action shall be stayed for a
6 period of sixty (60) days from the date this stipulation is filed with the Court.

7 b. The stay shall immediately terminate upon Plaintiff's filing with the
8 Court, and serving upon Defendant, a notice that Defendant must file an answer to Plaintiff's
9 complaint in this action or otherwise respond to same in accordance with the *Federal Rules of
Civil Procedure* and by no later than twenty-one (21) days after service of the notice.

10 c. The parties stipulate that nothing in this delay shall be deemed to prejudice
11 Defendant's right to file an Anti-SLAPP motion, under NRS 41.635 *et. seq.*

12 **SO STIPULATED AND AGREED** on this 9th day of August, 2016.

13 **THE AMIN LAW GROUP NV, LTD.**

14 /s/Ismail Amin, Esq.
15 ISMAIL AMIN, ESQ.
16 Nevada Bar No. 9343
17 3753 Howard Hughes Parkway, Suite 200
18 Las Vegas, Nevada 89169
19 Telephone: (702) 990-3583

20 *Attorney for Plaintiff*

13 **RANDAZZA LEGAL GROUP, PLLC**

14 /s/Mark J. Randazza, Esq.
15 MARC J. RANDAZZA, ESQ.
16 Nevada Bar No. 12265
17 4035 South El Capitan Way
18 Las Vegas, Nevada 89147
19 Telephone: (702) 420-2001

20 *Attorney for Defendant*

21 **IT IS SO ORDERED.**

22

UNITED STATES DISTRICT JUDGE

23 Dated: _____